Case 1:24-cv-03118-VSB



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## Document 16 Filed 07/22/24 Page 1 of 1 APPLICATION GRANTED SO ORDERED VERNON S. BRODERICK U.S.D.J.

7/19/2024
The deadline to submit the joint letter and Case Management Plan is extended to August 23, 2024.

July 18, 2024

VIA ECF

Hon. Vernon S Broderick, U.S.D.J. United States District Court, Southern District of New York 40 Foley Square New York, New York 10007

Re: Brandon Cooper v. The Office of the Commissioner of Baseball, et al.

Case No. 1:24-cv-03118-VSB

Dear Judge Broderick:

This firm represents Defendants The Office of the Commissioner of Baseball and PDL Blue, Inc. (collectively, "Defendants"). Pursuant to Your Honor's Individual Rules and Practices 1(G), we, joined by counsel for Plaintiff Brandon Cooper ("Plaintiff"), write to respectfully request that the deadline for the parties to file a joint letter pursuant to the Order and Notice of this Court, dated July 12, 2024 (Doc. No. 14), be adjourned 30 days, from July 24, 2024, up to and including August 23, 2024 (with any related deadlines similarly extended).

The parties have been engaging in good faith and working collaboratively to attempt to narrow issues before raising them with the Court, and they make this request to enable them to continue to do so. Plaintiff's counsel intends to amend the Complaint in the coming weeks to add an additional plaintiff and causes of action arising under federal law, and Defendants will require the additional time to review the Amended Complaint and investigate any new claims and allegations. The requested extension is also necessary to allow the parties to properly frame their claims and defenses in advance of submitting them to the Court, and discuss whether a resolution is possible at this juncture.

This is the parties' first request for an extension of the deadline to submit the joint letter, and the requested extension will not impact any other currently scheduled dates. We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Shira M. Blank

Shira M. Blank